

1 CHRISTOPHER CHIOU
2 Acting United States Attorney
3 District of Nevada
4 Nevada Bar Number 14853
5 ALLISON REESE
6 Nevada Bar Number 13977
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Email: allison.reese@usdoj.gov
Attorneys for the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

COMPLAINT

2:22-MJ-109-VCF

VIOLATIONS:

18. U.S.C. § 1951(a) - *Interference with Commerce by Robbery*

18 U.S.C. § 924(c)(1)(A)(ii) – Brandishing a Firearm During and in Relation to a Crime of Violence

18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm

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BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
Complainant, being duly sworn, deposes and states:

COUNT ONE

Interference with Commerce by Robbery
(18 U.S.C. § 1951(a))

5 On or about January 19, 2022, in the State and Federal District of Nevada,

GEORGE PEREZ,

7 defendant herein, did knowingly obstruct, delay, affect, and attempt to obstruct, delay and
8 affect commerce as that term is defined in Title 18, United States Code, section 1951(b)(3), and
9 the movement of articles and commodities in such commerce, by robbery as that term is
10 defined in Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully
11 take and obtain property, to wit: approximately four hundred, thirteen dollars (\$413) in United
12 States currency, from the person and in the presence of an employee and agent of the Ross
13 Dress for Less, located at 1720 E. Charleston Blvd, Las Vegas, Nevada, against the will of said
14 employee and agent, and by means of actual and threatened force, physical violence, and fear
15 of injury to the person of said employee and agent; all in violation of Title 18, United States
16 Code, Section 1951.

COUNT TWO

Brandishing a Firearm During and in Relation to a Crime of Violence
(18 U.S.C. § 924(c)(1)(A)(ii))

19 On or about January 19, 2022, in the State and Federal District of Nevada,

GEORGE PEREZ,

defendant herein, during and in relation to a crime of violence charged in Count One of this
Criminal Complaint, knowingly carried and used a firearm, to wit: a semi-automatic handgun,
said firearm being brandished; all in violation of Title 18, United States Code, Section
924(c)(1)(A)(ii).

COUNT THREE

Felon in Possession of a Firearm

(18 U.S.C. § 922(g)(1) and 924(a)(2))

On or about January 25, 2022, in the State and Federal District of Nevada,

GEORGE PEREZ,

the defendant herein, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding a year, to wit: Possession of a Controlled Substance in the Eighth Judicial District Court for Clark County, Nevada on or about October 31, 2001, in Case No. C175812; Attempt Possession of a Controlled Substance with Intent to Sell, in the Eighth Judicial District Court for Clark County, Nevada on or about January 24, 2006, in Case No. C216823; Burglary in the Eighth Judicial District Court for Clark County, Nevada on or about March 31, 2006, in Case No. C218032; Possession of Credit or Debit Card without Cardholder's Consent in the Eighth Judicial District Court for Clark County, Nevada on or about January 5, 2011, in Case No. C263981; and Burglary in the Eighth Judicial District Court for Clark County, Nevada on or about February 8, 2011, in Case No. C268799; did knowingly possess a firearm, to wit: a Taurus G2 9mm handgun bearing serial number TMT23245, said possession being in and affecting interstate commerce, and said firearm having been shipped and transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

PROBABLE CAUSE AFFIDAVIT

1. Your Complainant is a Special Agent with the Federal Bureau of Investigation (FBI), having been so employed since January 2018, and is currently assigned to the Las Vegas Field Office's Safe Streets Gang Task Force and Violent Crimes Task Force. Prior to your Complainant's appointment as a Special Agent, your Affiant was a commissioned law enforcement officer with the New Mexico State Police for approximately five years within the

1 patrol and criminal investigation division. As an FBI Agent, your Complainant was previously
2 assigned to the FBI Sacramento Strike Force focusing on transnational organized crime,
3 western hemisphere (TOC-W) involving large-scale drug trafficking and money laundering by
4 drug cartels. Currently, your Complainant is responsible for investigating a variety of violent
5 crimes, to include bank robbery, kidnapping, extortion, Hobbs Act robbery, carjacking, assault
6 and murder of federal officers, racketeering related violent offenses, as well as long-term
7 investigations into the activities and operations of career criminals, criminal enterprises, drug
8 trafficking organizations, and violent street gangs. Your Complainant has experience in
9 conducting criminal investigations, including the investigation of criminal groups and
10 conspiracies, as well as the collection of evidence and the identification and use of witnesses.

11 2. The information used to support this Complaint was derived from reports of
12 information obtained from eyewitnesses to the offenses described herein as well as
13 investigations conducted by law enforcement related to the incidents. This Complaint contains
14 information necessary to support probable cause to believe that the criminal offenses described
15 herein were committed by the defendant, **GEORGE PEREZ**, and is not intended to include
16 each and every fact and matter observed or known by me. Moreover, to the extent that this
17 Complaint contains statements by witnesses, those statements are set forth only in part and in
18 substance and are intended to accurately convey the information, but not to be verbatim
19 recitations.

FACTS ESTABLISHING PROBABLE CAUSE

21 3. On January 19, 2022, Las Vegas Metropolitan Police Department (LVMPD)
22 patrol officers were dispatched to a report of an armed robbery at the Ross Dress for Less
23 located at 1720 E. Charleston Blvd., Las Vegas, Nevada 89101. Prior to the report, an adult
24 male (later identified as George PEREZ) entered the Ross Dress for Less. PEREZ approached

1 cash register number four with socks in his hands and placed the socks on the counter. The
2 cashier scanned the socks and PEREZ gave the cashier a ten-dollar (\$10) bill to pay. When the
3 cashier opened the cash register to give PEREZ change, PEREZ produced a black handgun
4 with a silver barrel and pointed it at the cashier. In response, the cashier pulled approximately
5 two hundred dollars (\$200) from the cash register. PEREZ refused and stated, "No,
6 everything." The cashier then removed the drawer from the cash register and placed it on the
7 counter. PEREZ momentarily placed the firearm on the counter and grabbed approximately
8 four hundred, thirteen dollars (\$413) from the drawer, and ran out the front door. The
9 encounter was captured on store surveillance cameras. PEREZ was described as an Hispanic or
10 Black male adult, medium build, 5'6"-5'8", wearing a black balaclava, black hoodie, black
11 pants, and black shoes. PEREZ also had a noticeable hobble in his gait when walking through
12 the store.

13 4. On January 20, 2022, LVMPD patrol officers were dispatched to a report of an
14 armed robbery at the Shoe Palace located at 3528 S. Maryland Parkway, Las Vegas, Nevada
15 89101. Prior to the report, PEREZ entered the Shoe Palace and was assisted by an employee
16 who helped PEREZ select a Raiders football team jacket. PEREZ then approached the cashier
17 with the jacket in his hand to purportedly purchase the jacket. PEREZ produced a black semi-
18 automatic handgun, pointed it at the cashier, and demanded money from the cash register.
19 In response, the cashier pulled approximately two hundred dollars (\$200) from the cash register
20 and gave it to PEREZ. PEREZ then left towards the front of the store but returned to the
21 register area and demanded the cashier give PEREZ all the money in the cash register. The
22 cashier then gave PEREZ two-hundred dollars (\$200) more from another register. PEREZ then
23 left with the Raiders jacket and currency through the front door of the business. The encounter
24

1 was captured on store surveillance cameras. PEREZ was described as a Black male adult,
2 heavy build, wearing a black cloth mask, gray zip-up hoodie, light blue jeans, and black shoes.

3 5. On January 21, 2022, LVMPD patrol officers were dispatched to a report of an
4 armed robbery at WSS Shoes located at 4440 E. Charleston Blvd, Las Vegas, Nevada 89102.
5 Prior to the report, PEREZ entered WSS Shoes, browsed through the store, and selected a pair
6 of children's Nike shoes. PEREZ then approached the cashier with the Nike shoes in his hand
7 to purportedly purchase the Nike shoes. The cashier rang up the purchase and PEREZ
8 provided the cashier a few bills. When the cashier opened the register to cash out the
9 transaction, PEREZ produced a black semi-automatic handgun with a silver barrel, rested it on
10 the counter pointed towards the cashier, and demanded money from the cash register. In
11 response, the cashier pulled approximately five-hundred, seventy-four dollars (\$574) from the
12 cash register and gave it to PEREZ. PEREZ then left towards the front of the store with the
13 Nike shoes and currency. PEREZ was met by the Security Officer and PEREZ brandished the
14 firearm and continued past the Security Officer. The encounter was captured on store
15 surveillance cameras. PEREZ was described as a light-skinned, Black male adult, heavy build,
16 5'8"-5'10", wearing a hunter green ski mask, black hoodie, black jeans, and black shoes.
17 PEREZ also had the same noticeable hobble in his gait when walking through the store as he
18 did in the first armed robbery at the Ross Dress for Less on January 19, 2022.

19 6. On January 21, 2022, LVMPD patrol officers were dispatched to a report of an
20 armed robbery at DSW Shoes located at 2100 N. Rainbow Blvd., Las Vegas, Nevada 89108.
21 Prior to the report, PEREZ entered DSW browsed through the store and selected a pair of
22 children's Nike shoes. PEREZ then approached the cashier with the Nike shoes and currency in
23 his hand to purportedly purchase the Nike shoes. Once the cashier opened the register, PEREZ
24 stated "I don't want to cause a scene, give me all the money." PEREZ then lifted his jacket and

1 brandished a black semi-automatic handgun, which was tucked in his waistband on the right
2 side, exposing only the handle. In response, the cashier pulled approximately one-hundred, fifty
3 dollars (\$150) from the cash register and gave it to PEREZ along with the initial currency
4 PEREZ had given the cashier to pay for the Nike shoes. PEREZ also demanded the cashier lift
5 the register drawer to ensure there was no money underneath, and demanded the cashier open
6 the other registers. The cashier told PEREZ she did not have access to the other registers.
7 PEREZ then left towards the front of the store with the Nike shoes and currency through the
8 front door of the business. The encounter was captured on store surveillance cameras. PEREZ
9 was described as a light skin, Black male adult, medium to heavy build, 5'8"-5'10", wearing a
10 hunter green ski mask, black hoodie, black jeans, and black shoes. The firearm was described as
11 a black and grey semi-automatic handgun.

12 7. On January 22, 2022, LVMPD patrol officers were dispatched to a report of an
13 armed robbery at DD's Discount located at 2650 E. Desert Inn Road, Las Vegas, Nevada
14 89121. Prior to the report, PEREZ entered DD's Discount, spoke with the loss prevention
15 officer, and then selected a pack of white t-shirts. PEREZ then approached the cashier with the
16 pack of t-shirts and presented a one-hundred-dollar (\$100) bill to purportedly purchase the t-
17 shirts. The cashier accepted the bill, opened the register, and lifted the drawer to put the bill
18 underneath. As the cashier lifted the drawer, PEREZ drew a black firearm and placed it on the
19 counter, pointed at the cashier, and told the cashier "Put all those hundreds in the bag right
20 now." In response, the cashier pulled all the hundreds out of the drawer and put the bills in a
21 plastic DD's bag. PEREZ then stated, "Those twenties too." The cashier then put all the
22 twenty-dollar (\$20) bills in the bag and asked if PEREZ wanted the coins too. PEREZ said no
23 and left the store with approximately one-thousand dollars (\$1,000) from the cash register and
24 the bag of t-shirts. The encounter was captured on store surveillance cameras. PEREZ was

1 described as a Black male adult, heavy build, 5'8", wearing a hunter green ski mask, black
2 hoodie, black jeans, and black shoes. The firearm was described as a black and grey semi-
3 automatic handgun.

4 8. On January 25, 2022, at approximately 1705 hours, an armed robbery occurred
5 at Game Stop located at 83 N. Nellis Blvd., Las Vegas, Nevada 89110. PEREZ entered Game
6 Stop and spoke with the cashier, with whom he requested help him find a specific video game.
7 The cashier queried the inventory and informed PEREZ he did have the game in stock. The
8 cashier then retrieved the video game case from the shelf and walked back behind the counter
9 where the actual video games were kept. Once the cashier was at the register, PEREZ produced
10 a black firearm and pointed it at the cashier. PEREZ then told the cashier to open the register.
11 The cashier asked PEREZ if he was serious, and PEREZ stated, "I'm not going to talk." The
12 cashier gave PEREZ all the one dollar (\$1) bills, but PEREZ demanded more and told the
13 cashier, "Give me the hundreds." The cashier emptied the cash register and put all the cash in
14 the bag and included a tracking device. PEREZ then fled through the front doors with
15 approximately five-hundred and forty-nine dollars (\$549) and the tracking device.

16 9. On January 25, 2022, at approximately 1750 hours, an armed robbery occurred
17 at Reebok located at 7400 S. Las Vegas Blvd., Las Vegas, Nevada 89123. PEREZ entered
18 Reebok and spoke with the cashier, with whom he requested help him select a pair of kid shoes.
19 Once PEREZ had the shoes in his hand, he approached the cashier and waited as the cashier
20 processed the transaction. PEREZ then handed the cashier a one-hundred-dollar (\$100) bill and
21 waited for her to open the register. Once the register was open, PEREZ told the cashier to put
22 everything in the bag. The cashier gave PEREZ approximately three-hundred dollars (\$300)
23 and immediately shut the cash register. PEREZ became agitated and asked the cashier why she
24 closed the cash register. PEREZ then looked over his shoulder and made a hurried exit out of

1 the store with the currency and pair of Reebok kid's shoes. PEREZ was described as a heavy
2 build, Black male adult, 30-40 years old, 5'6", wearing a black baseball cap with white logo,
3 olive green ski mask, black hoodie, black pants, and black shoes. The firearm was described as
4 a black semi-automatic handgun.

5 10. On January 25, 2022, at approximately 1840 hours, an armed robbery occurred
6 at TJ Maxx located at 2190 N. Rainbow Blvd., Las Vegas, Nevada 89108. PEREZ entered TJ
7 Maxx, selected black Champion socks, and approached the register to purportedly purchase the
8 socks. The cashier asked PEREZ if he was paying with cash or card, at which point, PEREZ
9 presented a twenty-dollar (\$20) bill. Once the cashier accepted the payment and opened the
10 cash register, PEREZ drew a black firearm and placed it on the counter pointed at the cashier.
11 PEREZ then demanded all the money in the drawer and told the cashier to hurry up or he
12 would shoot her and take the money himself. The cashier emptied the drawer, which contained
13 approximately one-thousand dollars (\$1,000), and PEREZ told the cashier to lift the drawer to
14 show PEREZ the drawer was completely empty. PEREZ then fled the TJ Maxx with the
15 currency and the socks. PEREZ was described as a heavy build, Black male adult, 5'8",
16 wearing a black baseball cap, green ski mask, black hoodie, black pants, and black shoes. The
17 firearm was described as a black semi-automatic handgun.

18 11. On January 25, 2022, at approximately 1907 hours, LVMPD Robbery Detectives
19 received an alert from the tracker PEREZ had received during the robbery of the Game Stop at
20 1705 hours that same day. LVMPD Detective C. Snyder began monitoring the GPS tracker and
21 directed the LVMPD air unit to the area of the GPS data tracker. Around approximately 1921
22 hours, LVMPD Air Unit observed a dark gray Chrysler Town and County minivan (Vehicle 1)
23 matching the location and travel path of the GPS tracker travelling eastbound on Conosa Ave
24 towards Maryland Parkway. Vehicle 1 then turned southbound on 11th Street towards

1 St. Lewis Ave. Vehicle 1 then came to a stop briefly near 1067 Bonita Ave before continuing
2 southbound towards St. Lewis Ave. LVMPD Officers Balasabas and Rivera, who were
3 operating a marked LVMPD patrol unit, located Vehicle 1 and attempted to conduct a traffic
4 stop on the vehicle using emergency lights and siren. The driver, PEREZ, failed to yield to the
5 emergency vehicle by speeding off at a high rate of speed. Officers Rivera and Balasabas
6 initiated a vehicle pursuit. PEREZ continued to drive at a high rate of speed and failed to stop
7 at numerous red lights. At approximately 1927 hours, Officer Rivera conducted a Pursuit
8 Intervention Technique (P.I.T) maneuver on the vehicle at the intersection of St. Lewis and
9 Maryland Parkway. PEREZ was then taken into custody wearing all black clothing. The driver
10 was positively identified as George PEREZ, by his Nevada Driver's License. PEREZ's physical
11 descriptors also matched that of the robbery suspect from the aforementioned robberies.

12 12. LVMPD Detective J. Taylor responded to the scene of the arrest and conducted a
13 probable cause search of the vehicle. Inside the vehicle, Detective Taylor located the GPS
14 tracker from Game Stop, an olive-green ski mask, a black hat with a white logo, a Game Stop
15 bag, a TJ Maxx bag, Champion black socks, and a pair of white kid's Reebok shoes. Also
16 located in the vehicle was one-thousand, eight-hundred, ninety-seven dollars and eighty-five
17 cents (\$1,897.95). Detective Taylor then directed patrol units to look in the area of 1067/1072
18 Bonita Ave, where the air unit observed the vehicle stop briefly, and the GPS tracker was
19 stationary from approximately 1921-1922 hours. During the canvass of the area, patrol officers
20 located a Taurus G2 9mm handgun, Serial Number: TMT23245 near 1072 Bonita Ave. The
21 firearm was black in color with a silver ejection port. LVMPD crime scene analysts recovered
22 the firearm. An NCIC records check was conducted. According to the records check, the
23 firearm was reported stolen on October 26, 2021 in Las Vegas, Nevada.

24

1 13. Based on my training and experience, the aforementioned firearm is a "firearm"
2 as defined in Title 18, United States Code, Chapter 44, Section 921(a)(3), and was not
3 manufactured in the State and Federal District of Nevada, and for the aforementioned firearm
4 to be possessed in the State and Federal District of Nevada, it had been shipped and transported
5 in interstate commerce.

6 14. As a result of PEREZ's actions, interstate commerce, or an item moving in
7 interstate commerce, was actually or potentially delayed, obstructed, or affected in any way or
8 degree, in that Ross Dress for Less, Shoe Palace, WSS Shoes, DSW Shoes, DD's Discount,
9 Reebok, TJ Maxx, and Game Stop all engage in interstate commerce through the sale of
10 products manufactured outside the state of Nevada, including the Raiders Jacket taken in the
11 robbery on January 20, 2022, the Nike shoes taken in the robberies on January 21, 2022; and
12 the Champion socks taken in the robbery on January 25, 2022.

13 15. Your Complainant has conducted a review of PEREZ's criminal history and has
14 learned that PEREZ was convicted of Possession of a Controlled Substance in the Eighth
15 Judicial District Court for Clark County, Nevada on or about October 31, 2001, in Case No.
16 C175812. This is an offense punishable by a term of imprisonment exceeding one year.
17 According to Court records, PEREZ pled guilty pursuant to a written plea agreement and was
18 sentenced to 12 to 30 months in prison, suspended, and placed on probation. This probation
19 was subsequently revoked on December 20, 2002. PEREZ was also convicted of Attempt
20 Possession of a Controlled Substance with Intent to Sell, in the Eighth Judicial District Court
21 for Clark County, Nevada on or about January 24, 2006, in Case No. C216823. According to
22 court records, PEREZ pled guilty pursuant to a written plea agreement and was sentenced to 19
23 to 48 months in prison. PEREZ was also convicted of Burglary in the Eighth Judicial District
24 Court for Clark County, Nevada on or about March 31, 2006, in Case No. C218032. According

1 to court records, PEREZ pled guilty pursuant to a written plea agreement and was sentenced to
2 24 to 60 months in prison. PEREZ was also convicted of two counts of Possession of Credit or
3 Debit Card without Cardholder's Consent in the Eighth Judicial District Court for Clark
4 County, Nevada on or about January 5, 2011, in Case No. C263981. According to court
5 records, PEREZ was found guilty following a jury trial and was sentenced to 4 to 10 years in
6 prison on Count 1 and 24 to 60 months in prison on Count 2. Finally, PEREZ was convicted of
7 Burglary in the Eighth Judicial District Court for Clark County, Nevada on or about February
8 8, 2011, in Case No. C268799. According to court records, PEREZ pled guilty pursuant to a
9 written plea agreement and was sentenced to 48 to 120 months in prison.

10 **CONCLUSION**

11 Based on the foregoing facts and information, I submit that there is probable cause to
12 believe that **GEORGE PEREZ** did commit violations of 18 U.S.C. § 1951(a) –*Interference with*
13 *Commerce by Robbery*; 18 U.S.C. § 924(c)(1)(A)(ii) – *Brandishing a Firearm During and in Relation*
14 *to a Crime of Violence*; and 18 U.S.C. §§ 922(g)(1) and 924(2)(2) – *Felon in Possession of a Firearm*.

15 Respectfully submitted,

16 
17 Special Agent Kylie Lowe
18 Federal Bureau of Investigation

19 Attested to by the Applicant in accordance with the requirements of Fed. R. Crim. P. 41 by
20 telephone on this 10th day of February 2022.

21 
22 THE HONORABLE CAM FERENBACH
23 UNITED STATES MAGISTRATE JUDGE
24